

REMARKS

Examiner Tsui is thanked for his careful analysis of the present application and for the withdrawal of the previously pending claim rejections. In this document, applicants have amended certain claims, including independent claims 14 and 54, and have added new independent claims 64 and 65. Full support for the amendment to claims 14 and 54 can be found *inter alia* in paragraph 40 of the specification (disclosing that the server 14 can be accessed remotely via mobile device 12). Full support for the new independent claims can be found in previously pending claim 33.


It is respectfully submitted that none of the pending claims are disclosed or suggested by the cited art. All of the claim rejections rely upon a combination of a Wilcock and Nagaoka references. It is noted that claims 14 and 54 have been amended to specify that the user interface is controllable by the mobile device. The cited art cannot reach the claimed invention, at least because Wilcock teaches directly away from this embodiment. In paragraph 117, Wilcock teaches that a separate personal computer is used to associate location information with the digital photograph. This teaches directly away from the notion of controlling the user interface with the mobile device. The Nagaoka reference is cited for its disclosure of a virtual folder that contains a pointer to an image location. This reference fails to overcome the direct teaching away of Wilcock or the foregoing aspect of the invention.

The remaining references were cited for other features of the claimed invention and similarly not useful in overcoming the deficiencies in the Wilcock and Nagaoka references. It is noted that no reference of record discloses both a virtual folder structure that contains pointers to an image location and the user interface being controllable via the mobile device, in accordance with the presently claimed subject matter. Claims 14 and 54, and those claims that depend therefrom, accordingly are patentable. Additionally, it is submitted that the remaining previously pending claims of the application are patentable as earlier stated.

New claims have been added, and these claims likewise are patentable over the cited art. The newly added method claims specify that the processor is configured to identify, after a selection of an image by a user, other images that have metadata in common with the selected image, wherein the common metadata is metadata other than the metadata used to initially search for the selected image. None of the cited references disclose or suggest the subject matter of these new claims. The newly added apparatus claims specify a similar feature for the configuration of the processor and are likewise patentable over the cited art.

Allowance is respectfully solicited.

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Respectfully submitted,

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